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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

21 It is hereby stipulated by and between counsel for the United States and counsel for all  
22 defendants that time be excluded under the Speedy Trial Act from May 17, 2021 through July 19, 2021.

23 The parties appeared before the district court for a status conference on May 17, 2021. This was  
24 the seventh district court appearance before this Court in which all of the defendants' counsel or their  
25 representatives appeared. Due to the ongoing public health emergency and the corresponding rules and  
26 procedures set forth in General Orders 72, 73, and 74, the hearing was conducted by Zoom  
27 videoconference without the defendants present. At the end of the hearing, the Court set the matter for  
28 further status on July 19, 2021, at 10:00 a.m. via Zoom and requested that the parties submit a proposed

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER  
Case No. CR 19-0280 RS

1 order regarding the exclusion of time under the Speedy Trial Act.

2 Because the discovery process is ongoing, the government and counsel for the defendants agree  
3 that time should be excluded under the Speedy Trial Act so that defense counsel may prepare, including  
4 by reviewing discovery and making arrangements to consult with their clients. 18 U.S.C.  
5 § 3161(h)(7)(B)(iv). The parties further agree that this case is so complex, due to the number of  
6 defendants and the nature of the prosecution, that it is unreasonable to expect adequate preparation for  
7 pretrial proceedings and for the trial itself within the otherwise-applicable time limits, within the  
8 meaning of 18 U.S.C. § 3161(h)(7)(B)(ii). For these reasons and as further stated on the record during  
9 court appearances, the parties stipulate and agree that time should be excluded under the Speedy Trial  
10 Act through July 19, 2021.

11 The undersigned Assistant United States Attorneys certify that they have obtained approval from  
12 counsel for the defendants to file this stipulation and proposed order.

13 IT IS SO STIPULATED.

14 DATED: July 9, 2021

/s/  
ANDREW M. SCOBLE  
ASEEM PADUKONE  
Assistant United States Attorneys

17 DATED: July 9, 2021

/s/  
GEORGE BOISSEAU  
Counsel for Rogelio Bellosio Aleman

19 DATED: July 9, 2021

/s/  
PETER ARIAN  
Counsel for Edwin Alvarado Amaya

21 DATED: July 9, 2021

/s/  
ERICK GUZMAN  
Counsel for Fernando Romero Bonilla

23 DATED: July 9, 2021

/s/  
KENNETH WINE  
Counsel for Kenneth Campos

25 DATED: July 9, 2021

/s/  
BRIAN BERSON  
Counsel for Evert Galdamez Cisneros

27 DATED: July 9, 2021

/s/  
JEFFREY BORNSTEIN, CAROLINE JACKSON

Counsel for Luis Velis Diaz

DATED: July 9, 2021

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/s/  
ALAN DRESSLER  
Counsel for Ronaldy Dominguez

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DATED: July 9, 2021

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/s/  
SHAFFY MOEEL  
Counsel for Oscar Espinal

DATED: July 9, 2021

/s/  
NAOMI CHUNG  
Counsel for Wilfredo Iraheta Landaverde

DATED: July 9, 2021

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/s/  
ROBERT WAGGENER  
Counsel for Kevin Reyes Melendez

DATED: July 9, 2021

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/s/  
JOANNA SHERIDAN  
Counsel for Christian Quintanilla

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DATED: July 9, 2021

/s/  
MARTIN SABELLI, RICHARD HULLINGER  
Counsel for Elmer Rodriguez

DATED: July 9, 2021

/s/  
CHARLES WOODSON  
Counsel for Marvin Osegueda Saravia

DATED: July 9, 2021

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/s/  
MARK VERMEULEN  
Counsel for Kevin Ramirez Valencia

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DATED: July 9, 2021

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/s/  
GREGOR GUY-SMITH  
Counsel for Alexis Cruz Zepeda

DATED: July 9, 2021

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/s/  
DENA YOUNG  
Counsel for Kevin Guatemala Zepeda

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**STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER  
Case No. CR 19-0280 RS**

## ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from May 17, 2021 through July 19, 2021 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that this case is so complex, due to the number of defendants and the nature of the prosecution, that it is unreasonable to expect adequate preparation for pretrial proceedings and for the trial itself within the otherwise-applicable time limits, within the meaning of 18 U.S.C. § 3161(h)(7)(B)(ii).

The Court concludes that the ends of justice served by excluding the time from May 17, 2021 through July 19, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from May 17, 2021 through July 19, 2021 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: July 9, 2021

  
HON. RICHARD SEEBORG  
Chief United States District Judge